



Debtor Honey Do Franchising Group, Inc.  
Name

Case number (if known) \_\_\_\_\_

**7. Describe debtor's business****A. Check one:**

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))  
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))  
☐ Railroad (as defined in 11 U.S.C. § 101(44))  
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))  
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))  
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))  
☒ None of the above

**B. Check all that apply**

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)  
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)  
☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

**8. Under which chapter of the Bankruptcy Code is the debtor filing?****Check one:**

- ☐ Chapter 7  
☐ Chapter 9  
☒ Chapter 11. **Check all that apply:**

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☒ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11.** If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

- ☒ No.  
☐ Yes.

If more than 2 cases, attach a separate list.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

- ☒ No  
☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor	_____	Relationship	_____
District	_____	Case number, if known	_____

Debtor Honey Do Franchising Group, Inc.  
Name

Case number (if known) \_\_\_\_\_

**11. Why is the case filed in this district?**

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**

☒ No

☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention?** (Check all that apply.)

☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? \_\_\_\_\_

☐ It needs to be physically secured or protected from the weather.

☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐ Other \_\_\_\_\_

**Where is the property?** \_\_\_\_\_

Number, Street, City, State & ZIP Code

**Is the property insured?**

☐ No

☐ Yes. Insurance agency \_\_\_\_\_

Contact name \_\_\_\_\_

Phone \_\_\_\_\_

**Statistical and administrative information**

**13. Debtor's estimation of available funds**

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

**14. Estimated number of creditors**

☒ 1-49

☐ 50-99

☐ 100-199

☐ 200-999

☐ 1,000-5,000

☐ 5001-10,000

☐ 10,001-25,000

☐ 25,001-50,000

☐ 50,001-100,000

☐ More than 100,000

**15. Estimated Assets**

☒ \$0 - \$50,000

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☐ \$1,000,001 - \$10 million

☐ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$500,000,001 - \$1 billion

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

**16. Estimated liabilities**

☐ \$0 - \$50,000

☐ \$50,001 - \$100,000

☐ \$100,001 - \$500,000

☐ \$500,001 - \$1 million

☒ \$1,000,001 - \$10 million

☐ \$10,000,001 - \$50 million

☐ \$50,000,001 - \$100 million

☐ \$100,000,001 - \$500 million

☐ \$500,000,001 - \$1 billion

☐ \$1,000,000,001 - \$10 billion

☐ \$10,000,000,001 - \$50 billion

☐ More than \$50 billion

Debtor Honey Do Franchising Group, Inc.  
Name

Case number (if known) \_\_\_\_\_

**Request for Relief, Declaration, and Signatures**

**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 12, 2024  
MM / DD / YYYY

**X** /s/ Thomas Brad Fluke  
Signature of authorized representative of debtor

Thomas Brad Fluke  
Printed name

Title CEO

**18. Signature of attorney**

**X** /s/ Brenda G. Brooks  
Signature of attorney for debtor

Date June 14, 2024  
MM / DD / YYYY

Brenda G. Brooks  
Printed name

Moore & Brooks  
Firm name

6223 Highland Place Way  
Ste 102  
Knoxville, TN 37919-4035  
Number, Street, City, State & ZIP Code

Contact phone (865) 450-5455

Email address bbrooks@moore-brooks.com

013176 TN  
Bar number and State

**Fill in this information to identify the case:**

Debtor name Honey Do Franchising Group, Inc.

United States Bankruptcy Court for the: EASTERN DISTRICT OF TENNESSEE

Case number (if known) \_\_\_\_\_

☐ Check if this is an  
amended filing

Official Form 202

**Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ Amended Schedule \_\_\_\_\_
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 12, 2024

**X** /s/ Thomas Brad Fluke

Signature of individual signing on behalf of debtor

Thomas Brad Fluke

Printed name

CEO

Position or relationship to debtor

**Fill in this information to identify the case:**

Debtor name Honey Do Franchising Group, Inc.  
United States Bankruptcy Court for the: EASTERN DISTRICT OF  
TENNESSEE  
Case number (if known): \_\_\_\_\_

☐ Check if this is an  
amended filing

**Official Form 204**

**Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

**A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.**

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Ari Stearn Ruberto, Isreal & Weiner 255 State Street, 7th Floor Boston, MA 02109		Attorney Fees				\$42,114.19
Baggott Law c/o Rolland W. Baggott III 4252 Harding Pike, Suite 105 Nashville, TN 37205		Attorney Fees				\$1,758.00
Kenneth Hale The Hale Law Firm 416 State St Bristol, TN 37620		Attorney Fees				\$927.10
Nelson Mullins Riley & Scarborough LLC 1320 Main Street, 17th Floor Columbia, SC 29201		Attorney Fees				\$7,500.00
Regions Bank c/o Ronald G. Smith, Exec. VP PO Box 1984 Birmingham, AL 35201		Line of Credit				\$53,999.29
Richard E. Ladd, Jr. PennStuart 804 Anderson Street Bristol, TN 37620		Attorney Fees - Lawsuit Sullivan County Chancery #22-CB-27757(M)				\$45,001.86
Robert M. Einhorn Zarco Einhorn Salkowski, P.A. One Biscayne Tower 2 S. Biscayne Blvd, 34th Floor Miami, FL 33131		US Dist. Court Western VA #22-cv-00014				\$1,352,910.65

Debtor Honey Do Franchising Group, Inc. Case number (if known) \_\_\_\_\_  
Name

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Trinity Valuation Consulting Group, PLC 801B Sunset Dr Johnson City, TN 37604		Valuation of damages for arbitration				\$18,523.00

**United States Bankruptcy Court  
Eastern District of Tennessee**

In re Honey Do Franchising Group, Inc.

Debtor(s)

Case No.

Chapter

11

**VERIFICATION OF CREDITOR MATRIX**

The above Debtor(s) hereby verifies under the penalty of perjury under the laws of the United States of America that the attached list of creditors is true and correct to the best of his/her knowledge.

Date: June 12, 2024

/s/ Thomas Brad Fluke

Thomas Brad Fluke/CEO

Signer/Title

Date: June 14, 2024

/s/ Brenda G. Brooks

Signature of Attorney

Brenda G. Brooks

Moore & Brooks

6223 Highland Place Way

Ste 102

Knoxville, TN 37919-4035

(865) 450-5455 Fax: (865) 622-8865



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Ruberto, Isreal & Weiner  
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c/o Rolland W. Baggott III  
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Nashville, TN 37205

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Biggs & Sons, Inc.  
1920 NorthPoint Blvd #114  
Hixson, TN 37343

Brett & Dr. Amanda Greene  
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SunSational Handyman, Inc.  
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Fort Walton Beach, FL 32547

District Director  
U.S. Small Business Admin  
2 International Plaza Dr., Ste. 500  
Nashville, TN 37217

District Director, IRS  
c/o Special Procedures Branch  
801 Broadway, MDP 146  
Nashville, TN 37203

Internal Revenue Service  
Centralized Insolvency Operation  
PO Box 7346  
Philadelphia, PA 19101

Investment Properties Improvements, LLC  
1600 West State Street  
Bristol, TN 37620

IRS  
710 Locust Street  
Knoxville, TN 37902

Jamey & Dr. Gretchen Bowling  
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Nelson Mullins Riley & Scarborough LLC  
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Columbia, SC 29201

Regions Bank  
c/o Ronald G. Smith, Exec. VP  
PO Box 1984  
Birmingham, AL 35201

Regions Bank  
c/o Bank Officer 840 State Street  
Bristol, TN 37620

Richard E. Ladd, Jr.  
PennStuart 804 Anderson Street  
Bristol, TN 37620

Robert M. Einhorn  
Zarco Einhorn Salkowski, P.A.  
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Miami, FL 33131

Scott Brown  
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State of Tennessee  
c/o Attorney General's Office  
Bankruptcy Division PO Box 20207  
Nashville, TN 37202

Thomas Brad Fluke  
602 Cypress Street  
Bristol, TN 37620

Tracy Parish  
TKMG Enterprises, Inc.  
5083 Main Street, Unit 5B  
Spring Hill, TN 37174

Trinity Valuation Consulting Group, PLC  
801B Sunset Dr  
Johnson City, TN 37604

United States Attorney  
Howard H. Baker, Jr. U.S. Cthse  
800 Market Street, Suite 211  
Knoxville, TN 37902

**United States Bankruptcy Court  
Eastern District of Tennessee**

In re Honey Do Franchising Group, Inc.

Debtor(s)

Case No.

Chapter

11

**CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)**

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Honey Do Franchising Group, Inc. in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

☒ None [*Check if applicable*]

June 14, 2024  
Date

/s/ Brenda G. Brooks

Brenda G. Brooks

Signature of Attorney or Litigant

Counsel for Honey Do Franchising Group, Inc.

Moore & Brooks

6223 Highland Place Way

Ste 102

Knoxville, TN 37919-4035

(865) 450-5455 Fax:(865) 622-8865

bbrooks@moore-brooks.com

**HONEY DO FRANCHISING GROUP, INC.**  
**STATEMENTS OF OPERATIONS AND SHAREHOLDER'S (DEFICIT)**

	<b>YEAR ENDED DECEMBER 31</b>	
	<b>2022</b>	<b>2021</b>
<b>Revenues</b>		
Royalties	\$ 613,040	\$ 623,331
Franchise fees	156,337	106,612
Marketing fees	162,557	4,875
Promotional materials	34,119	44,965
Other income	30,507	41,685
<b>Total Revenues</b>	<b>996,561</b>	<b>821,468</b>
 <b>Cost of Sales - promotional materials</b>	 <b>95,113</b>	 <b>23,043</b>
 <b>Gross Profit</b>	 <b>901,447</b>	 <b>798,425</b>
 <b>Operating Expenses</b>	 <b>1,100,539</b>	 <b>766,147</b>
 <b>Income (loss) from Operations</b>	 <b>(199,092)</b>	 <b>32,278</b>
 <b>Gain on Sale of Building</b>	 —	 194,494
<b>Grant Income - PPP</b>	48,545	—
<b>Interest Income</b>	20	5,850
<b>Interest (Expense)</b>	(10,220)	(32,994)
	<b>38,345</b>	<b>167,350</b>
 <b>Net Income</b>	 <b>(160,747)</b>	 <b>199,628</b>
 <b>Shareholder's Equity (Deficit) - Beginning</b>	 <b>(237,259)</b>	 <b>(20,781)</b>
 <b>Shareholder's Contributions / (Distributions)</b>	 <b>1,156</b>	 <b>(416,106)</b>
 <b>Shareholder's (Deficit) - Ending</b>	 <b>\$ (396,850)</b>	 <b>\$ (237,259)</b>

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**Honey Do Franchising Group Inc.**

05/03/24

**Profit & Loss**

Accrual Basis

January through December 2023

	Jan - Dec 23
Ordinary Income/Expense	
Income	
Convenience Fee	138.75
Franchise Training	15,000.00
Marketing Fund Revenue	197,723.75
Royalties	614,560.60
Shopify Income	22,636.35
Total Income	850,059.45
Cost of Goods Sold	54,496.45
Gross Profit	795,563.00
Expense	
Auto Expenses	14,248.54
Business License	2,933.41
Business Meetings	2,542.97
Computer Equipment	1,610.19
Computer Maintenance	9,143.70
Credit / Background Check	857.68
Depreciation Expense	9,310.00
Donations	250.00
Dues and Subscriptions	36,319.15
Employee Advance	0.00
Employee Relations	31,082.35
Fees & Fines	5,987.82
Field Visit Expenses	11,358.64
Franchisee Event	715.00
Insurance Expense	6,230.08
Interest Expense	36,243.62
Lead Generation	9,689.00
Marketing	155,555.95
Meals & Entertainment	3,878.62
Mowing	1,575.00
Office Cleaning	5,660.95
Office Supplies	14,743.50
Parking	22.65
Payroll Expenses	259,806.88
Postage & Delivery	297.78
Professional Fees	
Accounting	8,280.00
Legal Fees	612,078.29
Total Professional Fees	620,358.29
Reconciliation Discrepancies	-0.01
Reimbursed Expense	-14,157.05
Rent	15,953.52
Repairs & Maintenance	985.08
Shipping	1.10
State Licensing	60.46
Taxes	4,264.16
Training	97.23
Travel	8,523.38

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**Honey Do Franchising Group Inc.**

**Profit & Loss**

05/03/24

Accrual Basis

January through December 2023

	Jan - Dec 23
Uniforms	886.47
Utilities	19,163.33
Total Expense	1,276,199.44
Net Ordinary Income	-480,636.44
Other Income/Expense	
Other Income	
Interest Income	2.98
Total Other Income	2.98
Net Other Income	2.98
Net Income	-480,633.46